

Law Offices of Ellen C. Dove

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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

STEVEN L. LORAIN,)	Case No.: 11-cv-04934 JCS
)	
Plaintiff,)	
)	DECLARATION OF ELLEN C. DOVE
vs.)	
)	
SALESFORCE.COM, a corporation)	
)	
Defendant.)	

I, ELLEN C. DOVE, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and in the Northern District of California. I am the attorney of record for the Plaintiff, Steven Lorain, in this matter.

2. Shortly after I was contacted by opposing counsel from the Littler Mendelson lawfirm, Arthur Eidelhock informed me Rachel Courtney, who is the in house counsel of his client, Salesforce.com, is married to an investment advisor who has some business relationship with the Honorable Judge Edward Chen. I told

1 him immediately I would be uncomfortable with that circumstance.
2 We then began discussing whether this was a case suitable for
3 hearing only by the assigned Magistrate.

4 3. Last week I met with an individual in Sacramento who
5 requested I review a lease on a commercial property. We discussed
6 his retaining me to negotiate a new lease or a modification of the
7 existing lease. During the conversation he informed me the
8 principal owner of the property was a federal judge in San
9 Francisco. In response to my next question, I learned the landlord
10 was Judge Chen. I informed my client of the coincidence. He asked
11 me to represent him in the anticipated negotiations nonetheless. I
12 believe it would be most awkward to be having these important
13 discussions with the agent of a Judge who was presiding over a
14 pending case, particularly one that is as important as this one is
15 to my client, Mr. Lorain.

16 4. I have heard only good things about Judge Chen and would
17 not wish to have him recused if it were not for the above conflicts
18 potential.

19 I declare the foregoing is true under penalty of perjury under
20 the laws of the United States and the State of California.
21 Executed this 16th day of November, 2011, at Sacramento, CA.

22 /s/ Ellen C. Dove
23 ELLEN C. DOVE
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